

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**UNITED STATES OF AMERICA )**

**v. )**

**MARIA ISUNZA )**

**No. 08 CR 00296**

**Judge Joan B. Gottschall**

**MOTION TO WITHDRAW AS COUNSEL**

NOW COMES STANLEY L. HILL and YELENA A. DOLGOSHEEVA of Stanley L. Hill & Associates, P.C., and seek leave to withdraw as counsel for the defendant, MARIA ISUNZA, and request this Honorable Court to appoint Federal Public Defender to represent the defendant. In support of their motion, counsel states as follows:

1. On or about May 14, 2008, defendant retained Stanley L. Hill & Associates, P.C. to represent her in this matter.
2. On May 21, 2008, Stanley L. Hill and Yelena A. Dolgosheeva of Stanley L. Hill & Associates, P.C. filed their appearances on behalf of the defendant.
3. Defendant is unable to pay counsel's legal fees.

WHEREFORE, Stanley L. Hill and Yelena A. Dolgosheeva of Stanley L. Hill & Associates, P.C., pray that this Court enter an order granting Stanley L. Hill and Yelena A. Dolgosheeva of Stanley L. Hill & Associates, P.C. leave to withdraw as counsel for the defendant, Maria Isunza, and appoint Federal Public Defender to represent the defendant.

Respectfully submitted,  
/s Yelena A. Dolgosheeva